

Memorandum



772

DATE : March 6, 1989
TO : Charles Weems
FROM : Shirli Axelrod *Shirli Axelrod*
SUBJECT : Handling PCB at Georgetown--February 2, 1989 letter to
Wilder Construction from Construction Engineering

As we have discussed, the proposed procedure for handling PCB, submitted by Wilder and its subcontractor G L in Wilder's letter of February 20 is not acceptable to EAD. EAD had not been informed about its contents nor given a copy to review. Therefore, I have asked you to inform Wilder the procedure is not acceptable, contrary to your February 23 letter.

The disposition of materials containing PCBs as described by Wilder and G L's procedure is the major problem. Because of liability concerns, SCL's liquids over 1 ppm PCB are handled and disposed of as a PCB-contaminated organically detoxified waste. Disposal by landfilling at the Envirosafe Hazardous Waste Landfill in Idaho meets this requirement. Disposal to Fuel Processors for combustion at an unspecified facility does not meet this requirement.

I have met with your field staff and the contractors to work out an acceptable procedure, which I will confirm in a separate memo to you.

I would like to recap the outcome of our meeting of March 1, regarding procedure to prevent this type of problem recurring. You have told us Construction Engineering will transmit to EAD for approval any communications involving PCB or other environmental concerns in projects you division administers. Thank you for your prompt response in that meeting.

SA:bal

cc: Best
Axelrod
EAD 772
File

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